

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
- v. -	:	
	:	
TODD NEWMAN, and	:	No. 12-CR-00121 (RJS)
ANTHONY CHIASSON,	:	
	:	
	:	
Defendants.	:	
	:	
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**DECLARATION OF JOHN A. NATHANSON  
IN SUPPORT OF DEFENDANT TODD NEWMAN  
IN OPPOSITION TO THE GOVERNMENT’S MOTIONS *IN LIMINE*  
FOR ADDITIONAL EXPERT DISCLOSURES  
AND TO PRECLUDE CERTAIN EXPERT TESTIMONY**

JOHN A. NATHANSON, an attorney duly admitted to practice before the courts of the State of New York and the United States District Court for the Southern District of New York, declares, pursuant to 28 U.S.C. Section 1746, as follows:

1. I am a partner at Shearman & Sterling LLP, counsel to Defendant Todd Newman in the above-captioned action. I submit this declaration in support of Mr. Newman’s Opposition to the Government’s Motions *In Limine* for Additional Expert Disclosures and to Preclude Certain Expert Testimony.

2. Attached hereto as Exhibit A is a true and correct copy of Mr. Newman’s Expert Disclosure Letter with attached exhibits, dated October 3, 2012.

3. Attached hereto as Exhibit B is a list of defense exhibits that contain the news and analyst reports that form the basis of Professor Gregg A. Jarrell's summarization of relevant information that was in the market during the allegation time period, to date.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
October 18, 2012

/s/ John A. Nathanson  
John A. Nathanson